

THE SOUTHPORT INQUIRY

PHASE 1 CLOSING STATEMENT ON BEHALF OF THE COUNTER TERRORISM POLICING HEADQUARTERS (CTPHQ)

*References to transcripts are in the following format :
[Date/Internal Page/Transcript Lines] e.g. [14.10.25/p2/2 to p3/2]*

Introduction

1. In this brief closing submission, CTPHQ seeks to assist the Chairman in relation to:
 - a. the decision-making and information-sharing policies applicable to CTP Prevent practitioners prior to the attack on 29 July 2024; and
 - b. identifying areas for exploration in Phase 2 of this Inquiry.

2. While CTPHQ had no involvement with AR's case prior to the events of 29 July 2024, it holds responsibility for providing national guidance and training to the CTP network. Together with the Home Office, CTPHQ issued the relevant Prevent guidance and policies in place at the time. It is respectfully submitted that the evidence has shown that the guidance and training were fit for purpose, regularly reviewed and generally well understood by the dedicated police professionals who work on the front line in this difficult area.

3. The Inquiry has heard detailed evidence about AR's referrals to Prevent, and the fact that none passed into multi-agency information-gathering. The Chairman might think that those involved have shown a commendable degree of candour in reflecting upon the decision making involved. This will assist the Chairman in his desire to ensure that lessons are learned. It is, of course, always easier to review matters in hindsight, and the challenges faced by Counter Terrorism Case Officers (CTCOs) should not be underestimated. It is

clear that the police Prevent officers in this case worked hard, acted in good faith, and were doing their best to protect the public, as the Chairman and CTI expressly observed in relation to PS Thompson. [9.10.25/p71/17 to p72/7]. It is also impossible to say whether AR and his parents would have consented to or meaningfully engaged with any support offered through Prevent; nor whether further CTP involvement might have led to other forms of successful intervention through Pursue or local policing. Prevent is not, after all, a coercive or investigative tool.

4. There has been no complacency in relation to improving national guidance or training. The Chairman has heard evidence that in the period between AR's referrals and his horrific crimes on 29 July 2024, and since that terrible day, CTPHQ and its partners have made substantial efforts to improve Prevent guidance and training. Those efforts are ongoing. Whether those efforts are appropriate, sufficient, and moving in the right direction will be a key issue for Phase 2 of this Inquiry.

The adequacy of Prevent guidance in place between 2019-2021

5. AR was first referred to Prevent on 5 December 2019, when he was 13 years old. The referral was allocated to CTCO Carmen Thompson of CTPNW, who went on to deal with AR's second and third referrals in 2021. The use of the same CTCO in this regard was deliberate [09.10.25/p43/6-18].
6. At the time of the first referral, the principal source of guidance for CTCOs was the 2018 Policy for Prevent Practitioners [CTPHQ000014]. CTPHQ carefully implemented the roll-out of the Policy across the network to ensure CTP officers and staff were fully aware of its content [14.10.25/p12/1-14].
7. PS Thompson's evidence makes clear that she was aware of the policy and its fundamental relationship to her role as a CTCO [09.10.25/p23/10-15]. Fewer than three months before AR's referral, she had also completed (across 16-20 October 2019) the Prevent foundation course for CTCOs [09.10.25/p9/8-12], which she confirmed was beneficial to her understanding of the assessments framework [09.10.25/p10/5-13].

8. In 2019, specific guidance on what used to be referred to as “mixed, unclear and unstable ideologies” was provided to CTP practitioners by the Home Office and CTPHQ in a letter sent to all regional coordinators within the Prevent network on 25 June 2019 [CTPHQ000134]. Within policing, Regional Prevent Coordinators (RPCs) are responsible for ensuring awareness of updates and relevant policy documents among Prevent officers and staff within their region (see paragraph 6 of the second witness statement of DAC Victoria Evans dated 24 November 2025). The letter gave Prevent case examples including individuals who “are obsessed with massacre, or extreme or mass violence without specifically targeting a particular group (e.g. ‘high school shootings’)”. It made clear that “individuals whose ideological motivations are unclear, mixed or unstable, but who demonstrate a connection to, or personal interest in, extremism, terrorism or massacre, should be given the same consideration for support as those whose concerning ideological motivations are more consistent and obvious”.
9. The authors of the letter emphasised [CTPHQ000134_3]:

“When it comes to preventing people being drawn into terrorism, our responsibility is to offer interventions and support to all individuals who are at risk, irrespective of whether that risk is being driven by a true belief in an ideological cause or group, or whether an involvement to either of these is being driven by other vulnerabilities and complex needs.

The power of Prevent lies in tackling vulnerability early to prevent future harm. Oversimplifying the assessment of risk to offer support only to those with a very clear or embedded extremist ideology risks missing opportunities to support those with perhaps less obvious, but no less relevant or urgent, vulnerabilities.”
10. Until this Inquiry, it had been hypothesised that the CTCO who made the decisions to close AR’s referrals may not have been aware of the remit of Prevent and the policy position outlined in the letter (see for example the Prevent Learning Review at [HOM000062_0034]). The evidence heard by the Chairman has established that, in fact, she was so aware.
11. While PS Thompson could not specifically recall seeing the letter, she was clear that she was aware of it. Her evidence was that “*it would have been discussed in our daily team briefings*”

that we had". [09.10.25/p24/7-10] She reiterated that she was aware not just of the letter's existence but of its substance and the principles it reiterated [09.10.25/p24/11-17]. In particular, she knew that those who appeared not to subscribe to any particular ideology, but to have an interest in or fixation with mass violence, should be given the same consideration for support as those with identifiable personal ideologies [09.10.25/p26/18 to p27/25]. Ms Thompson did not dissent from the assertion, within the letter, that its contents reflected a reiteration and clarification of Prevent's remit, not an expansion of it. She was aware of the need to put subjects through the Police Gateway Assessment (PGA) stage, even where their motivations were unclear, provided they met the threshold for vulnerability to being drawn into terrorism [09.10.25/p28/4 to p.30/3].

12. While PS Thompson suggested that more formal training on individuals within that category might have assisted her, she was clear that she was comfortable with the application of the relevant principles, and that she had referred individuals within this cohort to Channel before, prior to her initial dealings with AR's case [09.10.25/p31/1 to p32/15].
13. PS Thompson was also familiar with the Dynamic Investigation Framework (DIF) [CTPHQ000040] in place in 2019. The DIF expressly and repeatedly identified fascination with mass-killings or massacres as an indicator that a subject may require support through Prevent (see [CTPHQ000110] and [14.10.25/p64/9-24]). PS Thompson had undertaken PGA and DIF training (by means of a group seminar in Birmingham) on 23 May 2019. She identified that the main purpose of this training was to make officers aware of the need to apply the DIF at the PGA stage [CTPNW000180_3]. The subtitle to the DIF itself made this requirement clear [CTPHQ000040_1].
14. PS Thompson considers that she did have appropriate regard to the DIF at this stage [CTPNW000180_0007]. Her evidence to the Inquiry was that she had the DIF and the 2019 joint letter in mind when approaching the case [09.10.14/p93/21 to p94/5].
15. During the PGA stage, Ms Thompson took a decision, informed by her supervisor, to move AR's case temporarily into a Police-led Partnership (PLP). This was the result of a

belief that this was the best or only way to obtain more information through an in-person visit with AR [09.10.25/p80/3-20]. CTPHQ respectfully agrees with the conclusion of the Independent Reviewer that this decision was not in line with the guidance [CTPHQ000014_15], and that progression into Channel multiagency information-gathering would have been appropriate [14.10.25/p109/1 to p110/15].

16. PS Thompson and her colleagues appear to have understood what the assessment process required of them. For example, PS Thompson identified the need to contact a Vulnerability Support Hub (VSH) in relation to AR's autism [09.10.25/p86/4-23]. She also recognised that best practice required a review of AR's school internet search history [09.10.25/p78/10-17]. The failure to follow through the VSH referral, or to follow up the internet search history checks, before closing AR's case on the PCMT were oversights. In the circumstances, such errors appear more likely to have been the result of competing pressures of work; rather than the result of any ambiguity within the available guidance. Again the Chairman might think that PS Thompson showed great bravery and candour when she reflected upon these aspects of the case.
17. PS Thompson's evidence to the Inquiry does not indicate that she was confused as to the role of the FIMU in the assessment process versus her role as the CTCO. She understood that if the FIMU were to consider there was no CT/DE concern for their purposes, that was not dispositive of her analysis as to the threshold for progression into Channel or PLP [09.10.25/p42/8 to p43/1]. It is obvious that she was not swayed by the JAT's indication (as communicated by the FIMU) that this was an appropriate case for progression into Channel/Dovetail, since she declined to take that course [09.10.25/p50/7 to pp51/5]. PS Thompson placed weight on her personal experience of AR during her meeting with him at his home address [09.10.25/p97/15 to p98/24].
18. By the time of AR's second and third referrals to Prevent (on 1 February 2021 and 22 April 2021), CTPHQ had introduced an updated Policy for Prevent Practitioners [CTPHQ000117] and a "One Stop Shop" CTCOs' Guide [CTPHQ000034]. Both documents were disseminated across the network in August 2020 [14.10.25/p50/11-13].
19. Among other things, the CTCOs' Guide offered clear assistance to CTP practitioners considering a subject's particular vulnerabilities in the context of assessing risk [CTPHQ000034_87]. AR's suspected autism required careful consideration under this

guidance, which expressly recognised that autism may be a protective factor or a factor indicating greater risk, depending on the unique circumstances of the subject [CTPHQ000034_88]. In this way, the CTCO guide “unpacked” the existing requirement for CTCOs to seek expert assistance from a VSH in appropriate cases. This requirement was also present within the 2019 DIF [CTPHQ000110_1].

20. The 2020 CTCOs’ Guide also emphasised the need for CTCOS, when completing the DIF, to consider available information in relation to a subject’s internet and social media usage [CTPHQ000034_94]. It is correct that neither the 2020 Guide nor the 2019 DIF were prescriptive as to who was responsible for undertaking online checks (whether the FIMU or the CTCO or both). Wherever possible, CTPHQ seeks to guide outcomes rather than to prescribe methods for achieving them. It should be remembered that regional CTUs and CTIUs vary in the structures and resources available to them. Even today, for example, some regions have dedicated open-source units while others do not compartmentalise tasks in this way. Nonetheless, the guidance clearly identified the need for CTCOs to consider under the DIF, independently of the FIMU’s assessment, the available information as to a subject’s online profile.
21. It is correct that there was no policy or guidance in place in relation to multiple referrals in 2021. As a matter of common sense, however, the fact of multiple Prevent referrals will always be relevant to an assessment of risk, and the deliberate use of the same CTCO was a considerable protective factor. PS Thompson accepted that “*multiple referrals would be factored into any assessment*” she made [CTPNW000180_14]. The experience of the author of the Prevent Learning Review (published August 2024) was that this was widely understood within CTP [HOM000062_29]:

“...This referral was closed without the level of professional curiosity expected bearing in mind this was a second referral. There were no policies in place or guidance regarding repeat or multiple referrals at the time although it was widely considered to be a potential increase in risk. From the Reviewer’s own experience, the repeat referral issue was being discussed as far back as 2014.”

22. Nonetheless, the need for greater attention to be paid during Prevent case management to (a) the implications of multiple referrals and (b) internet intelligence was the focus of

two CTPHQ initiatives in the years between AR's third referral and the events of 29 July 2024. These initiatives are outlined in the next section of this document.

23. Before turning to changes that have been made to the Prevent guidance, it is important to note that this Inquiry is dealing with the granular details of a specialist subject matter. It is true that an interested outsider might look at flowchart reproductions of the Prevent case management process (PCM) (such as the one found at [CTPNW000317_2]) and conclude that the system looks overly complex. It might be said, however, that the fact that a multifaceted, multiagency system dealing with issues of public safety can be reduced to a 1-page diagram illustrates precisely the opposite. As the evidence of DAC Victoria Evans made clear, the full PCM process is "*about six stages, each is quite clearly defined*", involving tests and terminology that are very familiar to police officers [14.10.25/p33/4 to p34/9]. DAC Evans continued:

"So some of the nuances of what you need to consider to make those decisions are complex because radicalisation and counter terrorism and safeguarding and vulnerability is complex. But the actual structure and the number of decision-making points, I wouldn't say is any more or less complex than an awful lot of other decision-making processes that we deal with in policing and broader safeguarding." [14.10.25/p34/10-17].

24. Cathryn Ellsmore, the Prevent lead within the Home Office, gave similar evidence to the Inquiry on this issue [13.10.25/p25/14 to p26/22]. Notwithstanding the changes that have been made to policy and guidance since 2019, the fundamental stages in the PCM process have not changed. A brief overview of these stages from a policing perspective is provided within paragraphs 33-38 of the first witness statement of DAC Evans [CTPHQ00006_7-8].
25. Overall, the evidence heard by this Inquiry indicates that, while perhaps confusing to the uninitiated, the process was not difficult for Prevent professionals to understand, and indeed it was understood by the CTCO in this case, see the evidence of PS Thompson (as above).

Key changes to Prevent guidance between AR's third referral and 29 July 2024

26. By 2023, CTPHQ had become aware of the issue around the inconsistent treatment of multiple referrals across the CTP network. In January 2023, CTPHQ issued an Addendum to the 2020 Prevent Policy, providing specific guidance on the topic, and introducing a level of oversight from a Prevent officer of Inspector rank in certain cases (principally where referrals came from more than one source) [CTPHQ000035]. The introduction of this Addendum is a key example of CTPHQ's continuous work to identify and disseminate learning across the network [14.10.25/p92/11-25 and CTPHQ00010]:

“The 2023 Addendum came as a result of increased learning from academia, feedback from intelligence colleagues, findings from our Business Assurance Processes, and recent Prevent Learning Reviews. The Addendum highlighted the cumulative risk that multiple-referrals (defined as two or more referrals) can pose within our case work.”

27. The multiple-referrals policy was substantively amended and strengthened in 2025, as set out in a later section of this document.
28. In October 2022, CTPHQ published a policy designed to improve the use of internet intelligence in the Prevent case management process, namely the Internet Intelligence Investigation policy (colloquially known as Triple III). The policy is designed to ensure that information about a subject's online activity is gathered and assessed, wherever this is appropriate, and to provide clarity between the differing III expectations for FIMU assessors and CTCOs [13.10.25/p176/5-17].
29. It was suggested in evidence that CPTNW were not aware of the III policy until November 2024, when CTPHQ conducted a business assurance visit [14.10.25/p72/20 to p74/2]. It may not matter for the Chairman's purposes in Phase 1; but the second witness statement of Victoria Evans (dated 24 November 2025) provides some assurance in this regard, at paragraphs 23-24. CTPHQ distributed the draft policy via email to all RPCs including the CTPNW RPC on 21 October 2022. CTPNW representatives were in fact directly involved in creating that policy via a working group. The CTPNW RPC was

also directly involved in approving an amended version in subsequent weeks. The amended final policy was redistributed to the regional coordinators, including to the CTPNW RPC, on 28 February 2023. Business assurance checks to ensure awareness of and compliance with the III policy (such as the visit to CTPNW in November 2024 referred to above) are ongoing [14.10.25/p75/12 to p76/8].

30. In response to recommendations of the Independent Reviewer of Prevent, Sir William Shawcross, following his work between 2021 and 2023, the Home Office introduced updated Prevent Duty Guidance [HOM000014], and new Channel Duty Guidance [HOM000021] in late 2023. The impetus for and significance of those changes is set out in the evidence of Cathryn Ellsmore at [HOM000078_35-38].

31. One of the key recommendations of Sir William Shawcross's report was to refocus the Prevent objectives, to underline its central purpose under the CONTEST strategy to combat terrorism. The report reiterated the centrality of ideology to the legislative definition of "terrorism". In CTPHQ's experience, the operational impact of this renewed emphasis on ideology is sometimes overstated. Victoria Evans, the Senior National Coordinator for Prevent and Pursue, emphasised in her evidence to the Inquiry that the relevant CTP guidance did not narrow after the Independent Reviewer's report:

"A. I think in operational reality, our approach didn't dramatically change because what our officers were concerned with was the vulnerability and now susceptibility to being drawn into terrorism, and our policies, the DIF and all of the documents that supported it, still reflected that, because we were working very much upstream, there could be a broad range of things that could impact on somebody being susceptibility or vulnerable into being drawn into terrorism. So whilst I accept that at a very high policy level the nuance is there, it didn't dramatically change our operational application of the vulnerability and susceptibility to being drawn into terrorism, because the threat is broad.

Q. So if it were to be suggested that the narrowing down in the first objective may have been unhelpful in placing undue emphasis on ideological causes, should I understand from your previous answer that, while you see that as a linguistic nuance, operationally you don't think it had that effect?

A. I don't believe it did because we didn't communicate that as a change of direction in any significant way to our workforce. We, as I say, are focused on the susceptibility and the vulnerability of being drawn into terrorism and that can be a very broad range of factors.” [14.10.25/p18/4 to p19/3]

32. Of greater significance to CTP Prevent practitioners was the introduction of the Prevent Assessment Framework (PAF) [CTPHQ000127]. This document was first published within the CTP network in May 2024 [CTPHQ000006_14] and went live in September 2024 [13.10.25/p16/13-16]. As the face of the document reflects, this was a joint project between CTPHQ, the Home Office, and experts from the Ministry of Justice CT Assessment and Rehabilitation Centre. The PAF is an accredited tool, meaning that all CTCOs must pass relevant training before they can use it [14.10.25/p90/21-23]. Accordingly, training sessions were provided to the CTP network from June 2024 (see, for example, the training materials provided by CTPHQ [CTPHQ000147]).
33. The PAF was specifically designed to provide CTCOs with “*a very firm structure to work through to record their considerations and their decision-making*” [14.10.25/p91/18-19]. It also consolidated previous policy, by absorbing both the DIF (for the PGA stage) and the Vulnerability Assessment Framework (the equivalent tool for the multi-agency assessment stage) into one document [13.10.25/p64/4-8]. If completed correctly, it should ensure that all recognised susceptibility factors are considered during Prevent case management.
34. In May 2024, around the same time as PAF was being introduced to the CTP network, CTPHQ also began to roll-out a new IT system for case management known as Prevent Case Management Tracker (enhanced) (PCMTe). The benefits of that system are summarised in the statement of Victoria Evans [CTPHQ000006_13]. The PCMTe is a more robust system for tracking outstanding actions and ensuring supervision [14.10.25/p96/1-19]. Provided that the system is used as designed, PCMTe also provides a safeguard against human errors of memory, in that it will not permit case closure where an action is outstanding [14.10.25/p96/20 to p97/21].

35. Both the PAF and the PCMTe reflect the change introduced by CTPHQ in April 2024 to the “fascination with mass-killings or school massacres” category as it had been known under the DIF. This was replaced with the ideological category name: “fascination with extreme violence or mass-casualty attacks” [CTPNW000016_5]).

Changes to Prevent guidance since the events of 29 July 2024

36. As the public would expect, CTPHQ took urgent actions to check and tighten relevant guidance in the aftermath of AR’s crimes. Jointly with her Home Office counterparts, DAC Evans commissioned an urgent Prevent Learning Review (PLR) which reported within a month of AR’s attack [CTPHQ000006_0010].
37. On 10 March 2025, in response to one of the PLR recommendations, CTPHQ issued an update to the 2023 Addendum policy on multiple referrals [CTPHQ000010]. The update strengthened the enhanced oversight procedures. Under the new policy, all multiple referral cases must be notified to a Prevent Inspector as soon as the issue is identified and irrespective of the stage of the Prevent case management process that has been reached [CTPHQ000010_8]. In addition, all multiple-referral cases that have not been referred to Channel or PLP must be passed to the relevant RPC or their deputy for an endorsement of that position in writing, before a multiple referral case can be closed on the PCMT reached [CTPHQ000010_8]. CTPHQ is currently conducting a business assurance process on each aspect of the multiple referrals policy.[14.10.25/p24/8-24].
38. On 7 April 2025, CTPHQ also introduced an interim policy on referrals concerning subjects categorised under “Fascination with Extreme Violence and Mass Casualty Attacks” [CTPNW000016]. The interim policy reiterated previous guidance including the joint 2019 letter and reflected growing concern about the increasing threat picture posed by this cohort in recent months [14.10.25/p103/7-21]. It also introduced a new enhanced senior officer oversight mechanism, similar to the one outlined above in relation to multiple referrals [CTPNW000016_11]. This interim policy, as well as the multiple referrals interim policy, form the subject of an ongoing review led by CTPHQ, designed to ensure their effectiveness.

39. While it is of course a matter for this Inquiry, the leads for Prevent within both CTPHQ and the Home Office have indicated that the various policy improvements since 2021, and in particular the PAF, are such that they can be confident that a case concerning a violence-fascinated individual of AR's presentation would be more appropriately handled today [14.10.25/p114/4-13]; [13.10.25/p63/9-19].
40. Guidance and policy require regular reviews to ensure that they remain up to date and as the threat picture evolves. This will often require CTPHQ to issue interim policies and updates, such as those detailed above. CTPHQ recognises the value in keeping the number of policy documents to a minimum and the One Stop Shop was created with this in mind. Interim policies require careful review, however, before they can sensibly be incorporated within the overarching policy documents [14.10.25/p98/4-20]. Officers can always access the online CT Policy Library to find up-to-date guidance (see paragraph 26 of the second witness statement of DAC Evans, dated 26 November 2025).
41. We know there is no room for complacency. On the contrary, CTPHQ and its partners have already undertaken significant work to progress recommendations arising from reviews of this case to date. This includes the PLR, as well as the CTP Dignate 2 report (finalised in February 2025), and Lord Anderson's Lessons for Prevent (published in July 2025).
42. Lord Anderson helpfully summarises much of the progress that CTPHQ has made to date between paragraphs 3.48 and 3.54 of his report [CTPNW000114_72-74].

Recommendations for areas to be explored in Phase 2

43. Under its Terms of Reference, the second phase of the Inquiry is "*expected to consider the adequacy of multi-agency systems to address the risk posed by young people whose fixation or obsession with, and desire to commit, acts of extreme violence presents a significant risk to public safety.*"
44. CTPHQ welcomes the focus on this category of individuals, who are increasingly referred to as "violence-fixated individuals" (or sometimes "violence-fascinated individuals") (VFIs).

45. To fulfil its purpose, the Inquiry will need to consider this category in the round, thereby including adults falling within the cohort. However, we endorse and encourage a particular focus on children and young people.
46. The Inquiry may need to consider whether Prevent is the right framework for assessing the very broad category known as VFIs. At present, and while recognising that disclosure in relation to Phase 2 has yet to take place, CTPHQ considers that Prevent remains the appropriate framework for anyone at risk of susceptibility to being drawn into terrorism. This will, in the majority of cases, include individuals fixated with mass casualty attacks. We recognise, however, that many VFIs may have an interest in committing crimes that, however appalling, do not constitute acts of “terrorism”; and therefore to include them within Prevent and wider Counter Terrorism systems may be detrimental to those referred individuals and to the system’s ability to tackle the core threats it is intended to address. There must be a whole-system approach by the Government to tackling the risks posed by VFIs. CTPHQ is, as ever, ready to assist the Chairman with any recommendations he may wish to consider or make in due course.
47. Another way in which this Inquiry may assist Prevent practitioners and improve public safety is through an expert and detailed exploration of online radicalisation, and the impact of the internet and social media on VFIs. In her evidence to the Inquiry, the Senior National Coordinator identified online threats as a key challenge for CTP [14.10.25/p13/22 to p14/7]. Obviously, online harm and the threat it poses to children is a matter of concern across all safeguarding and law enforcement bodies.
48. While CTP is an important part of tackling the risks posed by VFIs, and the impact of online harm, the public will be best protected by a joined-up, multi-agency approach to these complicated issues.
49. We look forward to working with the Inquiry Legal Team and with other Core Participants to progress the Chairman’s important task in this regard.

On behalf of CTPHQ

24.11.25

Matthew Butt KC

Ruby Shrimpton

3 Raymond Buildings